



**Arizona Department of Education
Health and Nutrition Services Division**

Administrative Review Summary Report

School Food Authority Name: Florence Crittenton Service of Arizona, Inc

CTD: 07-27-95

Site: Florence Crittenton Therapeutic Group Home

Contacts: Kellie Warren, CEO & Scott Swope, Facility Support

Review Date: November 20, 2019

Review Period: October 2019

Programs Reviewed:

- National School Lunch
 School Breakfast
 Afterschool Snack
 Fresh Fruit & Vegetable
 Special Milk
 At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
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Performance Standard 1: Certification & Benefit Issuance- Critical Area

No findings.

Performance Standard 1: Meal Counting & Claiming- Critical Area

No findings.

Performance Standard 2: Meal Components & Quantities- Critical Area

<p>1 Quantities observed during the review period did not meet minimum amounts required by the meal pattern for 9-12th grade. Grain quantities were not met on 3 days due to insufficient crediting documentation for the chicken strips, fish strips, and pasta. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.</p>	<p>Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue as well as ensuring that items on the menu have proper crediting documentation. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/online/. The CN Labels and Product Formulation Statements Recorded Webinar can be found on ADE's website at http://www.azed.gov/hns/nslp/trainingps/snparchivedwebinars/. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).</p>	<p><i>Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum amounts required by the meal pattern. Additionally, the certificates of completion for: Step by Step Instruction: How to Plan a Lunch Menu and CN Labels and Product Formulation Statements Recorded Webinar must both be submitted</i></p>
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- 2 Quantities observed during the review period did not meet minimum amounts required by the meal pattern for 9-12th grade. The weekly grain quantity was not met due to insufficient crediting documentation for the chicken strips, fish strips, and pasta. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue as well as ensuring that items on the menu have proper crediting documentation. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that weekly grain quantities meet minimum amounts required by the meal pattern.*
- 3 Quantities observed during the review period did not meet minimum amounts required by the meal pattern for 5-8th grade. Grain quantities were not met on 2 days due to insufficient crediting documentation for the chicken strips and fish strips. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations.
- Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue as well as ensuring that items on the menu have proper crediting documentation. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern. The Step by Step Instruction: How to Plan a Lunch Menu can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainingps/online/>. The CN Labels and Product Formulation Statements Recorded Webinar can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainingps/snarchivedwebinars/>. Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents).
- Please provide a written description of the changes that have been made to ensure that grain quantities meet minimum amounts required by the meal pattern. Additionally, the certificates of completion for: Step by Step Instruction: How to Plan a Lunch Menu and CN Labels and Product Formulation Statements Recorded Webinar must both be submitted*

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| 4 | Quantities observed during the review period did not meet minimum amounts required by the meal pattern for 5-8th grade. The weekly grain quantity was not met due to insufficient crediting documentation for the chicken strips and fish strips. This was determined to be a repeat finding from cycle two and contributed toward fiscal action calculations. | Discussed how current system allowed for this to happen and potential changes that could be made to ensure it doesn't continue as well as ensuring that items on the menu have proper crediting documentation. Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern . Please note that repeated violations involving food quantities may result in fiscal action and/or termination of performance-based reimbursement (extra 7 cents). | <i>Please provide a written description of the changes that have been made to ensure that weekly grain quantities meet minimum amounts required by the meal pattern.</i> |
| 5 | The meal service was not structured to comply with the meal pattern requirements of the multiple grade groups that were served. One meal pattern was used for grades 5-12th during lunch service. | Discussed allowable meal pattern grade groups per the grades served and feasible options for structuring the meal service to comply with quantity requirements (i.e. recipes changes, portion size changes, how to differentiate between students in different groups). Meal pattern requirements for the National School Lunch Program can be found on ADE's website at www.azed.gov/hns/nslp/mealpattern . | <i>Please provide a written description of the changes that have been implemented to ensure that meal pattern requirements of the multiple grade groups served are met.</i> |

Performance Standard 2: Dietary Specifications & Nutrient Analysis- Critical Area

No findings.

Meal Access & Reimbursement: Certification & Benefit Issuance

No findings.

Meal Access & Reimbursement: Verification

No findings.

Meal Access & Reimbursement: Meal Counting & Claiming

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| 6 | Daily edit checks are not being conducted appropriately. Specifically, the attendance factor is not included on the daily edit check. | Discussed how to complete daily edit checks using the attendance factor found on the claim. Also referred to the simplified version, since all students are free, found on ADE's website at ADE's website at http://www.azed.gov/hns/nslp/forms/ | <i>Please provide a completed daily edit check worksheet for the month of December. Additionally, please provide written assurance that daily edit checks will be conducted using the attendance factor.</i> |
| 7 | The participants enrolled listed on the claim do not match the actual enrollment. | Discussed how to correctly input numbers into the claim for total enrollment and that this should be the highest number during that month and not a cumulative number. | <i>Please provide a copy of the claim for the month of December with the correct number for participants enrolled. Additionally, please provide written assurance that the correct number will be used when submitting claims.</i> |

Meal Pattern & Nutritional Quality: Offer Versus Serve

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| 8 | Signage which explains what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable was not displayed to students at breakfast. | Discussed requirement for posting signage at the POS and referred to meal signage on ADE's website at http://www.azed.gov/hns/nslp/mealpat
tern/ | <i>Please provide the sign that has been displayed explaining what constitutes a reimbursable meal and includes the requirement to select 1/2 cup fruit or vegetable. Additionally, please provide written assurance that this sign will be displayed for all students to see.</i> |
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Meal Pattern & Nutritional Quality: Meal Components & Quantities

No findings.

Resource Management

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| 9 | Meals served to teachers, administrators, custodians, and other adults were not priced so that the adult payment was sufficient to cover the overall cost of the meal. | Discussed ways to determine adult meal prices, which included pricing adult meals to reflect the amount of reimbursement received for a free meal plus the per meal value of entitlement and bonus commodities for non-pricing programs. Referred to adult meal pricing tool on ADE's website at http://www.azed.gov/hns/nslp/rm/ . | <i>Please provide a written description of the steps which have been taken to increase adult meal prices and resolve the discrepancy, including the exact formula used to price adult meals. Additionally, please submit supporting documentation which reflects that prices have been increased to the appropriate level.</i> |
| 10 | The Financial Management System utilized was insufficient to accurately identify, and track all revenues and expenditures of the nonprofit school food service program. | Discussed feasibility for designating a separate financial account for the nonprofit school food service, as well as the requirement to differentiate revenues and expenditures of the nonprofit school food service program if a separate account cannot be designated. Discussed the importance of establishing a financial management system and internal controls needed to accurately track all revenues and expenditures of the nonprofit school food service program. Referred to ADE's website: http://www.azed.gov/hns/nslp/rm/ . | <i>Please provide a written description of steps that will be taken to ensure all revenues and expenditures of the nonprofit school food service account are easily identifiable as required in 7 CFR 210.14.</i> |

General Program Compliance: Civil Rights

No findings.

General Program Compliance: SFA On-Site Monitoring

No findings.

General Program Compliance: Local Wellness Policy

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| 11 | The LWP did not contain policies for food and beverage marketing. | Discussed updating the LWP to include policies that allow marketing and advertising of only those foods and beverages that meet Smart Snacks Standards during the school day. Explained that this requirement applies to exterior vending machines, posters, menu boards, coolers, trash cans and cups used for beverage dispensing, etc. Referred to ADE's LWP webpage at: http://www.azed.gov/hns/nslp/lwp/ . | <i>None required at this time.</i> |
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General Program Compliance: Competitive Food Services

No findings.

General Program Compliance: Professional Standards

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| 12 | The School Nutrition Program Director hired after July 1, 2015 did not meet the hiring standard requirement. | Referred to hiring standard waiver and discussed requesting a waiver from ADE specialist. | <i>Please provide a copy of the approved hiring waiver for the director.</i> |
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General Program Compliance: Water

No findings.

General Program Compliance: Food Safety, Storage and Buy American

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| 13 | The written food safety plan did not include a description of facility or adequate SOPs including: calibrating thermometers, receiving deliveries, storing food, facility/equipment maintenance, cooking time/temperatures, & salad bar. | Discussed sample SOPs and referred to Prototype Food Safety Plan found on ADE's food safety website at http://www.azed.gov/hns/nslp/foodsafety/ . | <i>Please provide a copy of the updated food safety plan.</i> |
| 14 | Temperature logs for food are not being maintained. | Discussed requirements for maintaining food temperature logs and tracking this on the production records or creating a separate temperature log. Temperature logs for food must be maintained for 6 months. Monitoring forms can be found on ADE's website at http://www.azed.gov/hns/nslp/foodsafety/ . | <i>Please provide a copy of the temperature log that will be used for food as well as written assurance that logs will be kept daily and maintained on-file for 6 months.</i> |
| 15 | Storage violations were observed; foods for child nutrition programs are not separated from other food used at the site. | Discussed separating and tracking food used for programs outside of child nutrition programs. Referred to Arizona's School Food Safety Guidance found on ADE's website at http://www.azed.gov/hns/nslp/foodsafety/ . | <i>Please provide a written description of the changes that have been made to correct the storage violations found.</i> |

<p>16 The following reviewed products indicated violations of the Buy American Provision in 7CFR 210.21(d) on-site at reviewed schools: mandarin oranges, pineapple. Additionally, documentation justifying a Buy American exception was not maintained.</p>	<p>Discussed the Buy American provision requirements and procedures to ensure compliance. Referred to SP38-2017, Buy American Webinar and FAQ. Funds used from the non-profit food service account must be used to procure food products that comply with the Buy American Provision. Additional information on the requirements of this provision, including ADE's prototype Buy American exception document, can be found on ADE's website at http://www.azed.gov/hns/nslp/forms/. Buy American Recorded Webinar and FAQ can be found on ADE's website at http://www.azed.gov/hns/sfp/</p>	<p><i>Please provide a written description of the changes that have been made to procurement and/or recordkeeping procedures to ensure that the requirements of the Buy American Provision are met.</i></p>
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General Program Compliance: Reporting & Recordkeeping

<p>17 Production records for breakfast and lunch were not accurately completed: Specifically, production records used/left over section is not consistently completed.</p>	<p>Discussed required sections of production records. Parts of a Production Record Guidance can be found on ADE's website at http://www.azed.gov/hns/nslp/mealpattern/. Production Record Overview Recorded Webinar & Webinar Slides can be found on ADE's website at http://www.azed.gov/hns/nslp/trainings/snparchivedwebinars/.</p>	<p><i>Please provide copies of completed breakfast and lunch production records for 7 consecutive days, as well as written assurance that all records will be maintained for 5 years. Additionally, the certificate of completion of Production Record Overview must be provided.</i></p>
<p>18 Production records for lunch did not list any of the salad bar items offered.</p>	<p>Discussed required sections of production records and ensuring that all items and quantities are correctly listed on the production records.</p>	<p><i>Please provide copies of completed lunch production records for 7 consecutive days with all of the salad bar items listed, as well as written assurance that all records will be maintained for 5 years.</i></p>
<p>19 Production record crediting doesn't consistently reflect correct amounts.</p>	<p>Discussed how to credit meal components and ensuring consistency with recipes, labels, and production records. Referred to the meal pattern webpage - http://www.azed.gov/hns/nslp/mealpattern/.</p>	<p><i>Please provide copies of completed breakfast and lunch production records for 7 consecutive days along with supporting crediting documentation.</i></p>
<p>20 Section 5 of the sponsor application in CNPWeb indicated that SFA is participating in special assistance provision when the SFA is not participating in it.</p>	<p>Discussed steps required to update sponsor application in CNPWeb to reflect current practices.</p>	<p><i>Please resubmit a sponsor application indicating that the SFA doesn't participate in special assistance provision. Additionally, please provide written assurance that the sponsor application in ADE's CNPWeb will accurately reflect current practices.</i></p>

General Program Compliance: School Breakfast Program & Summer Food Service Program Outreach

No findings.

Other Federal Program Reviews: Afterschool Snack Program

Not applicable.

Other Federal Program Reviews: Seamless Summer Option

Will be reviewed in Summer 2020 if applicable.

Other Federal Program Reviews: Fresh Fruit & Vegetable Program

Not applicable.

Other Federal Program Reviews: Special Milk Program

Not applicable.

Other Federal Program Reviews: At-Risk Afterschool Meals

Not applicable.

Comments/Recommendations:

Congratulations on completing the Administrative Review! Thank you for your hard work and cooperation during this process. Please keep up the great work!

To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <http://www.azed.gov/hns/nslp/>.

Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainings/>.

Fiscal Action Assessed?

<input checked="" type="checkbox"/> No- SBP	<input type="checkbox"/> Yes- SBP	\$0
<input checked="" type="checkbox"/> No- NSLP	<input type="checkbox"/> Yes- NSLP	\$374.50

Fiscal Action under \$600 will be disregarded.

Please submit corrective action response by March 27, 2020 to Lindsey.Cler@azed.gov or 1535 W. Jefferson St, Bin #7, Phoenix, AZ 85007.



2/24/2020

Reviewer Signature

Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the National School Lunch Program Administrative Review Appeal Procedures found here:

<https://cms.azed.gov/home/GetDocumentFile?id=58dbe2581130c01500d4b08b>

Kathy Hoffman, Superintendent of Public Instruction
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